

1 William J. Flynn, State Bar No. 95371  
2 Scott M. De Nardo, State Bar No. 216749  
3 NEYHART, ANDERSON, FLYNN & GROSBOLL  
4 44 Montgomery Street, Suite 2080  
5 San Francisco, CA 94104  
6 Tel. (415) 677-9440  
7 Fax (415) 677-9445  
8 Email: sdenardo@neyhartlaw.com

9 **Attorneys for Plaintiffs**

10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 (San Francisco Division)

13 SOLANO & NAPA COUNTIES  
14 ELECTRICAL WORKERS HEALTH AND  
15 WELFARE TRUST FUND; et al.,

16 Plaintiffs,

17 vs.

18 CAMERON ELECTRIC & LIGHTING  
19 DESIGN, a sole proprietorship; ZACHARY  
20 ALAN CAMERON, its owner;  
21 CAMERSON ELECTRIC dba CAMERON  
22 ELECTRIC & LIGHTING DESIGN,

23 Defendants.

Case No. C-07-04111 VRW

**DECLARATION OF MARK H. LIPTON  
IN SUPPORT OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
MOTION FOR DEFAULT JUDGMENT  
AGAINST DEFENDANTS CAMERON  
ELECTRIC & LIGHTING DESIGN AND  
ZACHARY ALAN CAMERON**

[F.R.C.P. Rule 55(a)]

Date: April 10, 2008  
Time: 2:30 p.m.  
Courtroom: 8, 4<sup>th</sup> Floor  
Location: 280 South First Street  
San Jose, CA 95113  
Judge: Hon. James Ware

**DECLARATION OF MARK H. LIPTON**

I, MARK H. LIPTON, declare and state:

1. I am an attorney at law, licensed to practice before all of the courts of the State of California and a member of the bar of this Court. I am not a party to this action. I am employed by the Solano-Napa Counties Electrical Workers' Pension Plan, which serves as collection and disbursement agent for all of the above trusts as well as the other funds listed as Plaintiffs in this action, as Trust counsel. My duties include overseeing the collection of delinquent employer contributions accruing based on obligations Defendants CAMERON ELECTRIC & LIGHTING DESIGN and ZACHARY ALAN CAMERON incurred under collective bargaining agreements to which Cameron was signatory. (*See* Letter of Assents attached to the Complaint as Exhibits "A" and "B"). Those agreements are the Residential Agreement – Northern California Bay to the Borders Agreement and the Inside Construction Agreement (also known as the Inside Wireman's Agreement). (*See* collective bargaining agreements, respectively attached to the Complaint as Exhibits "C" and "D"). I make the following declaration based upon my knowledge, except as to those matters which are herein stated on information and belief, and as to those matters, I believe them to be true. If called as a witness, I can and would testify competently thereto.

2. Under the various Solano-Napa Counties Electrical Workers' Trust Agreements (Health and Welfare, Pension, Joint Apprenticeship and Training) to which Defendant ZACHARY ALAN CAMERON, individually and dba CAMERON ELECTRIC & LIGHTING DESIGN (hereinafter collectively referred to as "Cameron") agreed to be bound, late payments are subject to a liquidated damages charge. This charge is equal to 10% of all contributions that are delinquent. Payments are due postmarked on or before the 15th of the month following the month when the work was performed. Payments are deemed delinquent if both the Employer's Report of

Contribution (“ERC” or “transmittal”) and contributions owed thereupon are not postmarked on or before the 15th of each month for all work performed in the preceding month. Liquidated damages are increased to 20% upon referral to collection counsel. The funds are also entitled to interest on unpaid principal. In order to expedite the computation of the damages owed in this case and obtain a Judgment as expeditiously as possible, the final damages figure in paragraph six below only calculates liquidated damages at 10% and does not include any pre-judgment interest. This results in a savings to the Defendants.

3. Commencing on or before January 1, 2007, I began interfacing directly with Mr. Zachary Cameron as well as his independent bookkeeper, Ms. Lorraine McCreedy. At that time Cameron was significantly behind in fringe benefit contribution payments under the Residential Agreement – Northern California Bay to the Borders Agreement (attached as Exhibit C to the Complaint) as well as the Inside Wireman’s Agreement (attached as Exhibit D to the Complaint).

4. By the end of September 2007, I had received all of Cameron’s transmittals from January 1, 2007 through August 31, 2007. I then applied all credits based on payments made by Cameron to that time period. I also collected \$19,000.00 from a third-party based on mechanic’s lien. There was, at that time, \$32,330.00 due on the Residential Agreement and \$28,787.00 on the Inside Agreement. Total due was therefore \$61,117.00 excluding liquidated damages and interest which were an additional \$12,234.00. I then instructed Lorraine McCreedy to send me all transmittals thereafter directly.

5. The amounts that accrued thereafter were as follows based on transmittals sent me by Lorraine McCreedy.

Inside Wireman Agreement:

October 2007	\$13,770.00
November 2007	\$ 7,666.11
December 2007	\$ 6,789.36

Residential Agreement:

October 2007 \$ 4,000.49

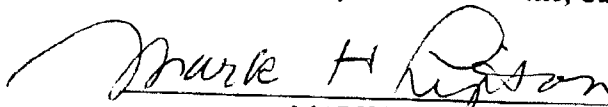
November 2007 \$ 1,873.91

The total owed for October 2007 through December 2007 reporting period was therefore \$34,099.87. The total accrued for the year was  $\$61,117.00 + \$34,099.87 = \$95,216.87$ . I have collected since then \$15,419.95 from D.A. Pope and \$25,508 from Peacock Construction, both general contractors. There was also an additional \$6,819.80 of liquidated damages due.

6. As of December 31, 2007 the balance still due and owing on unpaid contributions, excluding liquidated damages and interest, was \$54,288.92 and liquidated damages were \$9,526.50 using the ten percent rate, instead of twenty percent allowed per the agreements. The liquidated damage figure is greater than twenty percent of the outstanding principal because of the various third-party amounts described above that have been applied to delinquent principal amounts. (A true and correct copy of the transmittals from July 2007 through December 2007 are attached hereto as Exhibit "A"). Cameron also owes additional attorneys fees and costs as itemized in the Declaration of Scott M. De Nardo, filed concurrently herewith. This amount captures only what is currently known to be owing as of December 31, 2007 and does not include any unknown, additional sums, such as additional hours based upon January hours.

7. On February 13, 2008, I conducted a search of the United States Servicemembers Civil Relief Act database, located at the following website and determined that Defendant Zachary Camerson is not an active duty service member: <https://www.dmdc.osd.mil/scra/owa/home>. Furthermore, based upon my prior conversations with Cameron, he is neither an infant nor incompetent.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 19<sup>th</sup> day of February 2008 at Roseville, California.

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5 MARK H. LIPTON

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ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

EXHIBIT	A
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# Local 180 Solano Napa Inside Wiremen

## Employee Benefits Report

[Print](#)

Employer's Name, Address and Identification Number:

metron Electric  
12 3Rd St  
pa CA 94559  
ployer ID #0180FW1500

Employer's Federal Reg. No.:  
56-7592445

Mail this transmittal along with payment to:  
Local 180 Solano Napa Inside Wiremen  
PO Box 1320  
Suisun City, CA 94585

Total Number of Employees  
Employed This Period:  
6

1/2007 ← This report covers all Payroll Periods  
ending during the Month Shown

NECA Member: No

SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
616	Brazil	Rick	51	A	1	74.5	\$2,973.18	\$2,973.18	\$20.02	\$193.29
032	Buxton	Bradon	48	A	1	177	\$3,874.39	\$3,874.39	\$18.84	\$255.86
688	Glaze	Josh	FM	C	1	79.5	\$3,357.15	\$3,357.15	\$41.16	\$231.64
457	Leon-Guerrero	Steven	JM	C	1	142	\$5,147.50	\$5,147.50	\$36.25	\$382.81
489	Pirozzi	Dario	JM	A	2	183	\$7,529.64	\$7,722.54	\$38.25	\$501.95
443	Triola	Paul	FM	C	2	141	\$5,742.08	\$6,306.08	\$40.16	\$408.56
<b>Totals →</b>						807	\$28,423.84	\$29,645.34		\$1,852.11

NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS  
ke check payable to NEBF and mail with 2 copies) to:  
THERN CALIFORNIA CHAPTER, NECA  
Village Parkway  
in, CA 94588

→ \$895.36

## For Administrator's Use Only

Vacation/Dues (0.08 + \$0.20)	\$1,952.11
Health Insurance (\$10.11)	\$8,158.78
Pension DB (\$4.25)	\$2,677.51
Appr./Training (\$0.88)	\$554.40
LMCC (\$0.15)	\$121.06
NLMCC (\$0.01)	\$8.08
CAF (0.0133)	\$398.94
ECT (0.01)	\$298.48
401(a) (Variable)	\$1,213.50
VEBA (Variable)	\$934.00
<b>Total Due →</b>	<b>\$15,714.84</b>

July Inside

port

# Bay to the Borders Residential Agreement Employee Benefits Report

Print

Employer's Name, Address and Identification Number:

ameron Electric  
3 Coombs Street  
Suite A-3  
Suisun City, CA 94568  
Employer ID #B2BRA3500

Mail this transmittal along with payment to:  
Bay to the Borders Residential Agreement  
PO Box 1320  
Suisun City, CA 94568

Employer's Federal Reg. No.:  
56-7592445

Total Number of Employees  
Employed This Period:  
2

NECA Member: No

1/31/2007 ← This report covers all Payroll Periods  
ending during the Month Shown

SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
03496	Hillman	Nathan	JM	Napa (180)	175	\$4,759.04	\$27.04	\$320.54
5702	Thompson	Wayne	50	Napa (180)	156	\$2,824.23	\$13.52	\$200.65
<b>Totals →</b>					<b>331</b>	<b>\$7,583.27</b>		<b>\$521.19</b>

For Administrator's Use Only

	180	340	551	Totals
Vacation/Dues (0.06 + \$0.20)	\$521.19	(0.06 + \$0.20)	\$0.00	\$521.19
Health Insurance (\$6.35)	\$2,101.85	(\$6.35)	\$0.00	\$2,101.85
Pension DB (\$1.25)	\$413.75	(\$1.25)	\$0.00	\$413.75
Appr./Training (\$0.68)	\$225.08	(\$0.68)	\$0.00	\$225.08
NEBF (0.03)	\$227.50	(0.03)	\$0.00	\$227.50
LMCC (\$0.15)	\$49.65	(\$0.15)	\$0.00	\$49.65
NLMCC (\$0.01)	\$3.31	(\$0.01)	\$0.00	\$3.31
CAF (0.01)	\$75.83	(0.01)	\$0.00	\$75.83
ECT (0.01)	\$75.83	(0.01)	\$0.00	\$75.83
401(a) (Variable)	\$0.00	(Variable)	\$0.00	\$0.00
VEBA (Variable)	\$0.00	(Variable)	\$0.00	\$0.00
<b>Total Due →</b>				<b>\$3,693.99</b>

July Residential



# Local 180 Solano Napa Inside Wiremen Employee Benefits Report

Print

(B) Employer's Name, Address and Identification Number:				Mail this transmittal along with payment to: Local 180 Solano Napa Inside Wiremen PO Box 1320 Suisun City, CA 94585				Employer's Federal Reg. No.:			
Cameron Electric 2412 3rd St Napa CA 94559 Employer ID #0180IW1500								66-7892445			
8/31/2007 ← This report covers all Payroll Periods ending during the Month Shown								Total Number of Employees Employed This Period: 4			
								NECA Member: No			
SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues	
0032	Budon	Bradon	57	B	2	178	\$3,373.25	\$3,818.25	\$19.57	\$264.70	
0457	Leon-Guerrero	Steven	JM	C	1	200	\$7,250.00	\$7,850.00	\$39.25	\$511.00	
0488	Pirozzi	Dario	JM	A	2	88	\$3,561.28	\$3,850.28	\$38.25	\$236.82	
5143	Triola	Paul	51	C	2	157	\$8,305.12	\$8,933.12	\$16.02	\$447.38	
<b>Totals →</b>						<b>624</b>	<b>\$20,489.66</b>	<b>\$22,251.66</b>		<b>\$1,459.81</b>	
(12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS (Make check payable to NEBF and mail with 2 copies) to: NORTHERN CALIFORNIA CHAPTER, NECA 8300 Village Parkway Dublin, CA 94568											
										<b>\$867.85</b>	

For Administrator's Use Only		
Vacation/Dues	(0.08 + \$0.20)	\$1,459.81
Health Insurance	(\$10.11)	\$6,308.64
Pension DB	(\$4.25)	\$2,662.00
Appr./Training	(\$0.88)	\$549.12
LMCC	(\$0.15)	\$83.80
NLMCC	(\$0.01)	\$6.24
CAF	(0.0133)	\$295.95
ECT	(0.01)	\$222.51
401(a)	(Variable)	\$1,482.80
VEBA	(Variable)	\$424.00
<b>Total Due →</b>		<b>\$13,474.77</b>

## Marana Benefits Report

Page 1 of 1

# Bay to the Borders Residential Agreement Employee Benefits Report

(8) Employer's Name, Address and Identification Number:				Employer's Federal Reg. No.:				
Cameron Electric 68 Coombs Street Suite A-3 Napa CA 94559 Employer ID #B2BRA3500				56-7682446				
Mail this transmittal along with payment to: <b>Bay to the Borders Residential Agreement</b> <b>PO Box 1310</b> <b>Suisun City, CA 94585</b>				Total Number of Employees Employed This Period:				
8/31/2007 ← This report covers all Payroll Periods ending during the Month Shown				2				
				NECA Member: No				
SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
3496	Hillman	Nathan	JM	Napa (180)	87	\$1,811.68	\$27.04	\$122.10
5702	Thompson	Wayne	EO	Napa (180)	248.5	\$5,338.94	\$13.52	\$370.04
<b>Totals →</b>					315.5	\$7,150.62		\$492.14

For Administrator's Use Only							
	180		340		551		Totals
Vacation/Dues	(0.06 + \$0.20)	\$492.14	(0.06 + \$0.20)	\$0.00	(0.06 + \$0.20)	\$0.00	\$492.14
Health Insurance	(\$6.35)	\$2,003.43	(\$6.35)	\$0.00	(\$6.35)	\$0.00	\$2,003.43
Pension DB	(\$1.25)	\$394.38	(\$1.25)	\$0.00	(\$1.25)	\$0.00	\$394.38
Appr./Training	(\$0.68)	\$214.54	(\$0.68)	\$0.00	(\$0.68)	\$0.00	\$214.54
NEBF	(0.03)	\$214.52	(0.03)	\$0.00	(0.03)	\$0.00	\$214.52
LMCC	(\$0.15)	\$47.33	(\$0.15)	\$0.00	(\$0.15)	\$0.00	\$47.33
NLMCC	(\$0.01)	\$3.16	(\$0.01)	\$0.00	(\$0.01)	\$0.00	\$3.16
CAF	<sup>4</sup> / <sub>10</sub> (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00	\$71.51
ECT	<sup>1</sup> / <sub>10</sub> (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00	\$71.51
401(a)	(Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00	\$0.00
VEBA	(Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00	\$0.00
<b>Total Due →</b>							<b>\$3,512.52</b>

## Marana Benefits Report

Page 1 of 1

# Local 180 Solano Napa Inside Wiremen

## Employee Benefits Report

Print

(8) Employer's Name, Address and Identification Number: Cameron Electric 2412 3Rd St Napa CA 94559 Employer ID #0180IW1500				Mail this transmittal along with payment to: Local 180 Solano Napa Inside Wiremen PO Box 1320 Suisun City, CA 94585				Employer's Federal Reg. No.: 56-7592445		Total Number of Employees Employed This Period: 3	
9/30/2007 ← This report covers all Payroll Periods ending during the Month Shown								NECA Member: No			
SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues	
3032	Buxton	Bernadon	57	B	2	114	\$2,074.55	\$2,359.58	\$19.87	\$164.37	
0457	Leon-Guerrero	Steven	JM	C	1	198.5	\$7,250.72	\$7,840.22	\$36.25	\$508.71	
6143	Triola	Paul	51	C	2	148	\$5,943.68	\$5,535.68	\$16.02	\$421.74	
<b>Totals →</b>						<b>458.5</b>	<b>\$15,268.95</b>	<b>\$16,735.48</b>		<b>\$1,095.82</b>	

(12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS  
(Make check payable to NEBF and mail with 2 copies) to:  
NORTHERN CALIFORNIA CHAPTER, NECA  
6300 Village Parkway  
Dublin, CA 94568

→ \$502.06

For Administrator's Use Only		
Vacation/Dues	(0.06 + \$0.20)	\$1,095.82
Health Insurance	(\$10.11)	\$4,635.43
Pension DB	(\$4.25)	\$1,948.63
Appr./Training	(\$0.88)	\$403.48
LMCC	(\$0.15)	\$68.78
NLMCC	(\$0.01)	\$4.59
CAF	(0.0133)	\$222.57
ECT	(0.01)	\$167.36
401(a)	(Variable)	\$1,298.20
VEBA	(Variable)	\$282.00
<b>Total Due →</b>		<b>\$10,104.86</b>

## Marana Benefits Report

Page 1 of 1

# Bay to the Borders Residential Agreement

## Employee Benefits Report

Print

## (6) Employer's Name, Address and Identification Number:

Cameron Electric  
88 Coombe Street  
Suite A-3  
Napa CA 94559  
Employer ID #B2BRA3600

Employer's Federal Reg. No.:  
58-7592445

Mail this transmission along with payment to:  
Bay to the Borders Residential Agreement  
PO Box 1320  
Suisun City, CA 94585

Total Number of Employees  
Employed This Period:  
2

NECA Member: No

9/30/7 This report covers all Payroll Periods  
ending during the Month Shown

SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
3496	Hillman	Nathan	JM	Napa (180)	146.00	4150.64	\$27.04	273.34
702	Thompson	Wayne	50	Napa (180)	129.50	258.59	\$13.52	190.77
Totals →					275.5	4409.23		464.11

## For Administrator's Use Only

	180	340	551	Totals		
Vacation/Dues (0.06 - \$0.20)	\$492.14	(\$0.05 + \$0.20)	\$0.00	(\$0.06 + \$0.20)	\$0.00	459.11
Health Insurance (\$6.35)	\$2,003.43	(\$6.35)	\$0.00	(\$6.35)	\$0.00	1752.60
Pension DB (\$1.25)	\$394.38	(\$1.25)	\$0.00	(\$1.25)	\$0.00	345.01
Appr./Training (\$0.68)	\$214.54	(\$0.68)	\$0.00	(\$0.68)	\$0.00	187.68
NEBF (0.03)	\$214.52	(0.03)	\$0.00	(0.03)	\$0.00	8.28
LMCC (\$0.15)	\$47.33	(\$0.15)	\$0.00	(\$0.15)	\$0.00	141.40
NLMCC (\$0.01)	\$3.16	(\$0.01)	\$0.00	(\$0.01)	\$0.00	2.76
CAF 0/0 (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00	67.32
ECT 0/0 (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00	67.32
401(a) (Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00	\$0.00
VEBA (Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00	\$0.00

Total Due → 5293.62

\$ 2931.47

## Marana Benefits Report

Page 1 of 1

Local 180 Solano Napa Inside Wiremen  
Employee Benefits ReportPrint

## (8) Employer's Name, Address and Identification Number:

Cameron Electric  
2412 3RD St  
Napa CA 94559  
Employer ID #01801W1500Mail this transmittal along with payment to:  
Local 180 Solano Napa Inside Wiremen  
PO Box 1320  
Suisun City, CA 94585Employer's Federal Reg. No.:  
58-7592445Total Number of Employees  
Employed This Period:  
310/31/2007 ← This report covers all Payroll Periods  
ending during the Month ShownNECA Member, No **Yes**

SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
3032	Buxton	Bradon	57	B	2	221	\$4,077.97	\$4,630.47	\$19.87	\$322.03
157	Leon-Guameron	Steven	JM	C	1	194.5	\$7,197.84	\$7,781.34	\$36.25	\$505.78
143	Triola	Paul	51	C	2	176	\$7,068.16	\$7,772.16	\$16.02	\$501.53
<b>Totals →</b>						<b>591.5</b>	<b>\$18,343.97</b>	<b>\$20,183.97</b>		<b>\$1,329.34</b>

(12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS  
(Make check payable to NEBF and mail with 2 copies) to:  
NORTHERN CALIFORNIA CHAPTER, NECA  
6300 Village Parkway  
Dublin, CA 94568

→ \$605.52

## For Administrator's Use Only

Vacation/Dues (0.06 @ \$0.20)	\$1,329.34
Health Insurance (\$10.11)	\$5,980.07
Pension DB (\$4.23)	\$2,513.88
Appr./Training (\$0.68)	\$520.52
LMCC (\$1.15)	\$88.72
NLMCC (\$0.01)	\$5.92
CAF (0.0100)	\$268.45
ECT (0.01)	\$201.83
401(a) (Variable)	\$1,561.30
VEBA (Variable)	\$397.00
<b>Total Due →</b>	<b>\$12,887.03</b>

**Cameron Electric**  
2412 Third Street  
Napa, CA 94559

# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

**This report is due to the Administrator's office by the 15th of each month.**

☐ IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: <b>Cameron Electric</b> Address: <b>2412 Third Street</b> <b>Napa, CA 94559</b> Phone: <b>(707) 224-4646</b> Email: <b>lpopcorn@sbcglobal.net</b>	Employer's Federal ID <b>56-7502445</b> Payroll Period: <del>December 07</del> <b>NOV 07</b> Date: <b>1/8/2008</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: <b>Local 180 Solano-Napa Electrical Workers</b> <b>PO Box 1230 Suisun City, CA 94586-1230</b> *Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a> *Please note invoice on check <b>581200712</b>
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[illegible]



# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

This report is due to the Administrator's office by the 15th of each month.

☐ IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: <b>Cameron Electric</b>	Employer's Federal ID: <b>58-7592445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a> *Please note Invoicall on check <b>581200712</b>
Address: <b>2412 Third Street Napa, CA 94559</b>	Payroll Period: <b>December 07</b>	
Phone: <b>(707) 224-4646</b>	<b>Nov 07</b>	
Email: <b>lpopcorn@abglobal.net</b>	Date: <b>1/8/2008</b>	

	(2)		(3) Last 4	(4)	(5)	(6) New Term Date	(7)	(8)	(9)	(10)	(11)
	Last Name	First Name	SSN	Contract/Job Class	Job Date		Total Hours	Gross Pay	401a Rate	VEBA Rate	Vac/Dues
1											
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	(12) TOTALS						353.00	11,842.15			787.13

(13) NATIONAL ELECTRICAL BENEFIT FUND = 34% OF GROSS EARNINGS

Make check payable to "NEBF" and mail with a copy of this remittance to:

NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568

\$368.26

NECA MEMBER y	(14) NECA Service Charge = 0.6% of Gross Earnings Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to: NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230
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\$71.66

(15) The employer reporting herein recognizes that it is bound by the Restated Employees Benefit Agreement and Trust for the National Electrical Benefit Fund and agreed to make the required contributions to the Fund as provided for therein. The employer acknowledges having received a copy of the above Agreement. The employer certifies that the information contained in this report is a full and accurate statement of hours worked and wages earned of all employees subject to employer contributions pursuant to Article II of the Agreement and II to other covering all such non-responsing and employees or alumni employees only, except those who may be excluded pursuant to Section 4.5 of the Agreement. The employer further certifies that it is reporting on behalf of a named organization as defined in Article II of the Agreement, other all employees of the organization or alumni employees only are covered, except those who may be excluded pursuant to Section 4.5 of the NEBF Agreement.

(16) Signature	Title	Date
		1/8/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Please note Invoicall on check <b>581200712</b> ***Please Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a> ***	
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Health and Welfare	\$3,588.83
CATF	\$158.84
Pension DB	\$1,500.25
Dues	\$716.83
Vacation	\$70.60
JATC	\$284.75
Training	\$45.88
ECT	\$118.42
NLMCC	\$3.63
LMCC	\$52.85
401(a)	\$753.90
VEBA	\$0.00
<b>TOTAL</b>	<b>\$7,236.19</b>

1/8/2008 10:38 AM

MPR Nov



## **BAY to the BORDERS**

### *Residential Employee Benefits Report*

**This report and payment is due by the 16<sup>th</sup> of each Calendar Month**

[illegible]

Name	Title	Date
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	Rate	Total
Health Insurance	\$6.35 / Hour	\$ 057.21
JATC	\$ .88 / Hour	\$ 13.22
NEBF	3% of Gross	\$ 04.83
Pension	\$ 1.25 / Hour	\$ 278.12
LMCC	\$ .15 / Hour	\$ 24.97
National LMC	\$ .01 / Hour	\$ 6.65
Vacation/Dues	8% of Gross + \$ .20 / Hour	\$ 242.97
CAF	1% of Gross	\$ 34.84
ECT	1% of Gross	\$ 34.84
NEGA Dues		\$ 4,777.11
NEIF		\$
<b>TOTAL DUE</b>		<b>\$637.91</b>

**Cameron Electric**  
2412 Third Street  
Napa, CA 94559

	Rate	Total
Health Insurance	\$6.35 / Hour	\$
JATC	\$ .68 / Hour	\$
NEBF	3% of Gross	\$
Pension	\$1.25 / Hour	\$
LMCC	\$ .15 / Hour	\$
National LMC	\$ .01 / Hour	\$
Vacation/Dues	6% of Gross + \$ .20 / Hour	\$
CAF	1% of Gross	\$
ECT	1% of Gross	\$
NECA Dues		\$
NEIF		\$
	<b>TOTAL DUE</b>	\$



# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

This report is due to the Administrator's office by the 15th of each month.

☐ IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company:	Cameron Electric	Employer's Federal ID	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:
Address:	2412 Third Street Napa, CA 94559	58-7592445	Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230
Phone:	(707) 224-4846	Payroll Period:	*Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a>
Email:	lpopcorn@sbcglobal.net	December-07	*Please note invoices on check 581200712
Date:	1/8/2008		

	(2)		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
	Last Name	First Name	Last 4 SSN	Contract-Job Class	Job Date	New Term Date	Total Hours	Gross Pay	401a Rate	VEBA Rate	Vac/Dues
1											
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(12) TOTALS							312.00	10,736.84			706.53

(13) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS

Make check payable to "NEBF" and mail with a copy of the remittance to:

NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568

\$322.07

NECA MEMBER Y	(14) NECA Service Charge = 0.6% of Gross Earnings Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to: NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230
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\$64.42

(15) The employer reporting herein certifies that it is bound by the National Electrical Benefit Fund and agrees to make the required contributions to the Fund as provided for therein. The employer acknowledges having received a copy of the above Agreement. The employer certifies that the information contained in this report is a true and accurate statement of hours worked and wages earned of all employees subject to employer contributions (pursuant to Article 6 of the Agreement) and it is either delivering all such non-purchasing use employees or shared employees only, except those who may be excluded pursuant to Section 6.3 of the Agreement. The employer further certifies that it is reporting on behalf of a related organization as defined in Article 6 of the Agreement, either all employees of the organization or shared employees may be covered, except those who may be excluded pursuant to Section 6.3 of the NEBF Agreement.

Health and Welfare	\$3,154.32
CATF	\$142.78
Pension DB	\$1,326.00
Dues	\$644.13
Vacation	\$62.40
JATC	\$234.00
Training	\$40.66
ECT	\$107.36
NLMCC	\$3.12
LMCC	\$48.80
401(a)	\$641.40
VEBA	\$0.00
<b>TOTAL</b>	<b>\$6,602.67</b>

(16) Signature	Title	Date
		1/8/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:
Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230
*Please note invoices on check 581200712
*Please Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a>

1/8/2008 10:20 AM

MPR

☐ IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: <b>Cameron Electric</b> Address: <b>2412 Third Street</b> <b>Napa, CA 94559</b> Phone: <b>(707) 224-4646</b> Email: <b>lpopcorn@sbcglobal.net</b>	Employer's Federal ID <b>56-7592445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: <b>Local 180 Solano-Napa Electrical Workers</b> <b>PO Box 1230 Suisun City, CA 94585-1230</b> <i>*Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a></i> <b>*Please note invoice# on check 58120081</b>
	Payroll Period: <b>January-08</b> Date: <b>2/11/2008</b>	

[illegible]

Case 3:07-cv-04111-VRW Document 14 Filed 02/19/2008 Page 22 of 23

# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

This report is due to the Administrator's office by the 15th of each month.

☐ IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: <b>Cameron Electric</b>	Employer's Federal ID <b>56-7592445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: <b>Local 180 Solano-Napa Electrical Workers</b> <b>PO Box 1230 Suisun City, CA 94585-1230</b> <i>*Email the completed form to: <a href="mailto:EPR@IBEWLU180.org">EPR@IBEWLU180.org</a></i> <b>*Please note invoice# on check 58120081</b>
Address: <b>2412 Third Street Napa, CA 94559</b>	Payroll Period: <b>January-08</b>	
Phone: <b>(707) 224-4646</b>	Date: <b>2/11/2008</b>	
Email: <b>lpopcorn@sbcglobal.net</b>		

	(2)		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
	Last Name	First Name	Last 4 SSN	Contract-Job Class	Job Date	New Term Date	Total Hours	Gross Pay	401a Rate	VEBA Rate	Vac/Dues
1											
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(12) TOTALS							382.50	14,166.92			926.51

(13) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS

Make check payable to "NEBF" and mail with a copy of the remittance to:

**NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568**

**\$425.01**

<b>NECA MEMBER y</b>	(14) NECA Service Charge = 0.6% of Gross Earnings
	Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to:
	<b>NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230</b>

**\$85.00**

(15) The employer reporting herein recognizes that it is bound by the Restated Employees Benefit Agreement and Trust for the National Electrical Benefit Fund and agrees to make the required contributions to the Fund as provided for therein. The employer acknowledges having received a copy of the above Agreement. The employer certifies that the information contained in this report is a full and accurate statement of hours worked and wages earned of all employees subject to employer contributions (pursuant to Article 6 of the Agreement and it is either covering all such non-bargaining unit employees or alumni employees only, except those who may be excluded pursuant to Section 6.3 of the Agreement. The employer further certifies that if it is reporting on behalf of a related organization as defined in Article 6 of the Agreement, either all employees of the organization or alumni employee only are covered, except those who may be excluded pursuant to Section 6.3 of the NEBF Agreement.

(16) Signature	Title	Date
		2/11/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:

**Local 180 Solano-Napa Electrical Workers  
PO Box 1230 Suisun City, CA 94585-1230**

*\*Please note invoice# on check*

**58120081**

**\*\*\*Please Email the completed form to: [EPR@IBEWLU180.org](mailto:EPR@IBEWLU180.org) \*\*\***

Health and Welfare	\$3,867.08
CATF	\$188.41
Pension DB	\$1,625.63
Dues	\$850.01
Vacation	\$76.50
JATC	\$286.88
Training	\$49.73
ECT	\$141.67
NLMCC	\$3.83
LMCC	\$57.38
401(a)	\$687.00
VEBA	\$0.00
<b>TOTAL</b>	<b>\$7,834.12</b>



PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On February 19, 2008, I served the within:

**DECLARATION OF MARK H. LIPTON IN SUPPORT OF POINTS AND AUTHORITIES  
IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS  
CAMERON ELECTRIC & LIGHTING DESIGN AND ZACHARY ALAN CAMERON**

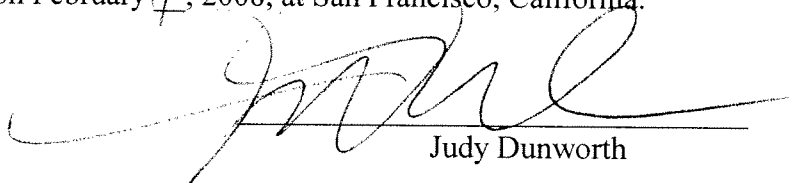
on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

ZACHARY ALAN CAMERON  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

CAMERON ELECTRIC dba CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on February 19, 2008, at San Francisco, California.

  
Judy Dunworth